



With respect to the '208 Patent, in the ASSA ABLOY IPRs the PTAB found that none of the challenged claims (which included all claims of the '208 Patent) are unpatentable based on the prior art submitted by ASSA ABLOY. ASSA ABLOY is seeking review (and if necessary, appeal) of the decisions on its '208 Patent IPRs. In the Apple IPR, the PTAB found that the challenged claims – *i.e.*, claims 1, 3-7, 9-11, 13 - are unpatentable based on the prior art submitted in the Apple IPR. (Dkt. 33-1). CPC has filed a notice of appeal in the Apple IPR.

With respect to the '705 Patent, in the ASSA ABLOY IPR the PTAB found that none of the challenged claims (which included all claims of the '705 Patent) are unpatentable based on the prior art submitted by ASSA ABLOY. ASSA ABLOY is seeking review (and if necessary, appeal) of the decision on its '705 Patent IPR. In the Apple IPR, the PTAB found that the challenged claims – *i.e.*, claims 1, 4, 6, 10-12, 14-17 - are unpatentable based on the prior art submitted in the Apple IPR. (Dkt. 33-2). CPC has filed a notice of appeal in the Apple IPR.

With respect to the '039 Patent, the PTAB has determined that all claims are unpatentable based on the IPRs filed by ASSA ABLOY and the IPR filed by Apple. The final written decisions in ASSA ABLOY's IPRs on the '039 Patent issued on January 30, 2024 and are attached as Exhibits A and B.<sup>1</sup> The final written decision in the Apple IPR is attached as Exhibit C. CPC has filed a notice of appeal in the Apple IPR and anticipates filing a notice of appeal in the ASSA ABLOY IPRs.

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<sup>1</sup> The Final Written Decision for the ASSA ABLOY '705 Patent IPR was submitted to the Court on December 3, 2023 (Dkt. 34), and the Final Written Decision with respect to the ASSA ABLOY '208 IPR was submitted on January 4, 2024 (Dkt. 35).

The outcomes of each IPR and the status of any appeals are summarized in the table below:

<b>Asserted Patent</b>	<b>IPR Case No</b>	<b>Challenged Claims</b>	<b>Outcome</b>	<b>Status</b>
<b>US 9,269,208</b>	IPR2022-00601 (Apple)	1, 3-7, 9-11, 13	All Challenged Claims Unpatentable	Notice of Appeal Filed
	IPR2022-01045 (ASSA ABLOY)	1-9	No Challenged Claim Found Unpatentable	Pending Review and Appeal
	IPR2022-01089 (ASSA ABLOY)	10-13	No Challenged Claim Found Unpatentable	Pending Review and Appeal
<b>US 9,665,705</b>	IPR2022-00602 (Apple)	1, 4, 6, 10-12, 14-17	All Challenged Claims Unpatentable	Notice of Appeal Filed
	IPR2022-01006 (ASSA ABLOY)	1-17	No Challenged Claim Found Unpatentable	Pending Review and Appeal
<b>US 8,620,039</b>	IPR2022-00600 (Apple)	1, 2, 19 and 20	All Challenged Claims Unpatentable	Notice of Appeal Filed
	IPR2022-01093 (ASSA ABLOY)	1, 2, 13, 14, 19, 20	All Challenged Claims Unpatentable	Anticipated Appeal
	IPR2022-01094 (ASSA ABLOY)	3-12, 15-18	All Challenged Claims Unpatentable	Anticipated Appeal

The parties respectfully submit that this case should remain stayed in its entirety pending the issuance of any Federal Circuit Court of Appeals decisions, or the expiration of any right of appeal to the Federal Circuit, with respect to each of the above-referenced ASSA ABLOY and Apple IPRs. The Parties further request that the Court enter an Order directing the Parties to submit a Status Report within fourteen (14) days of issuance of the Federal Circuit decision resolving the last of the ASSA ABLOY and Apple IPRs and/or within fourteen (14) days of the expiration of all rights to appeal, whichever is later, and that the Status Report include a description

of the outcome of the appeals along with the Parties' respective positions as to next steps in the litigation.

Date: February 14, 2024

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on February 14, 2024, a true and correct copy of the foregoing document was filed via the Court's CM/ECF system, which will serve all counsel of record who have appeared in this case per Local Rule 5(c).

/s/ Steven M. Coyle  
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